

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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PAUL ANTONELLIS, JR.  
Plaintiff,

v.

TOWN OF SALISBURY AND TIMOTHY  
MCINERNEY,  
Defendants

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CIVIL ACTION NO: 04-11678LTS

**JOINT MOTION TO REVISE DISCOVERY AND MOTION SCHEDULE**

The plaintiff and defendants jointly move this Honorable Court to revise the discovery and motion schedule in this matter, as ordered by the Court at the Status Conference on May 4, 2005, to set the following dates for the pre-trial schedule:

**I. Discovery**

**A. Phase One Discovery**

Last date to serve Request for Production of Documents September 31, 2005

Responses to Requests for Production of Documents thirty (30) days from service.

Last date to serve Interrogatories September 31, 2005

Response to all Interrogatories forty-five (45) days from service.

**B. Phase Two Discovery**

Completion of fact depositions January 31, 2006

Plaintiff's disclosure of expert witness reports February 28, 2006

Last date to serve Request for Admissions January 31, 2006

Responses to Requests for Admissions thirty (30) days from service.

Defendant's disclosure of expert witness reports May 31, 2006

Completion of expert depositions June 30, 2006

**II. Schedule for Motions**

Filing of summary judgment motions July 31, 2006

Filing response to summary judgment motions August 20, 2006

Final Pre-Trial Conference September 15, 2006

Trial December 15, 2006

WHEREFORE, the parties jointly move this Honorable Court to approve the above revised pre-trial schedule.

The Plaintiff  
PAUL ANTONELLIS, JR.

The Defendants,  
TOWN OF SALISBURY AND TIMOTHY  
MCINERNEY,

/s/ Robert W. Walker

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**CERTIFICATE OF SERVICE**

I certify that this document has been served upon all counsel of record in compliance with F.R.C.P. this 16<sup>th</sup> day of May, 2005.

/s/ Gareth W. Notis

Gareth W. Notis